

# EXHIBIT A

**From:** Caritis, Alexandra  
**To:** Rachel Abrams; Marden, Libby  
**Cc:** ghurd; Roopal P. Luhana; Sarah London  
**Subject:** RE: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady  
**Date:** Thursday, October 9, 2025 11:38:35 AM  
**Attachments:** RE Uber\_MDL Defendants' Expert Reports for Eric Piza Jason Morris Matthew Kalady.msg  
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Rachel,

Can we please do 130-2PT?

As a threshold matter to discuss, it's our position that for the experts we plan to rebut, we need at least 5 days between the dep. and the rebuttal deadline (currently Oct. 24).

Updated below and reattaching the info Libby sent yesterday re Thomas and West:

Expert Name	Deposition Date (Offered)	Pl Proposed Time Limit	Uber Counter	Confirmed?	Supplement?
Plaintiff Expert Weiner, Bruce	10/28	7 hours	7 hours	Need to discuss rebuttal deadline	Yes
Plaintiff Expert Drumwright, Meme (also in JCCP)	Pls to provide new dates	7 hours	7 hours		Yes
Plaintiff Expert Chandler, John	November 6-7	7 hours	12 hours	Too close to 11/10 daubert deadline	Yes
Plaintiff Expert Keller, Lacey	Need earlier dates due to rebuttal deadline	7 hours	7 hours		Yes
Plaintiff Expert Moore, Julie	October 22	7 hours	7 hours	CONFIRMED	
Plaintiff Expert Sawyer, David	October 17 Can't do this date, 10/23 or 10/24?	7 hours	9 hours		
Plaintiff Expert Tremblay, Tom	October 22, 23 (hard stop at 11am ET on 23rd)	9 hours	12 hours	Pls' position re time limit? Dates offered not enough time	
Plaintiff Expert Valliere, Veronique (also in JCCP)	Pl to provide new date	7 hours	7 hours		Yes
Plaintiff Expert Feldis, Jay (also in JCCP)	10/23	7 hours	7 hours	Need to discuss rebuttal deadline	
Plaintiff Expert Kelkar, Rajeev	October 24	7 hours	9 hours	Need to discuss rebuttal deadline	
Plaintiff Expert Rando, Cynthia	October 17 Can't do this date, can do any day the following week	7 hours	12 hours		
Plaintiff Expert Mechanic, Mindy (Psych)	No dates provided	12 hours	21 hours (7 3-hour days or split into 4 days)		
Plaintiff Expert Milnor, Mike	November 3	7 hours	7 hours	Need to discuss rebuttal deadline	
Plaintiff Expert Johnson Robert (also in JCCP)	October 20, 2025 (see Uber's position)  Is this confirmed?	7 hours	3 hours and JCCP dep treated as if taken in MDL	Can do 3 hour non-duplicative dep in afternoon on 10/20 so long as we can treat JCCP dep as if taken in MDL	
Plaintiff Expert Charlene Espritt (LCP)	November 4-5	7 hours	15 hours (3 for each report)	CONFIRMED	
Plaintiff Expert Brown, Erik (toxicologist)	October 15, 2025	7 hours	7 hours	CONFIRMED	
Plaintiff Expert Rad, Helena (Psych)	10/17? (previously offered) Is this confirmed?	3 hours	7 hours	We can do 10/17 if that still works	
Defendant Expert Kalady, Matthew (B.L.)	Waiting on Pls to confirm				
Defendant Expert Morris, Jason	November 5, 2025			CONFIRMED	
Defendant Expert Okpaku, Joseph	Uber can do 10/20 or find new later dates				
Defendant Expert Piza, Eric	October 30, 2025			CONFIRMED	
Defendant Expert Reminick, Alison	Waiting on Pls to				

(Mensing)	confirm				
Defendant Expert Stodden, Victoria	October 21				
Defendant Expert Thomas, Vida	10/27				
Defendant Expert Osgood, Robert (Minfield, Mensing)	Waiting on Pls to confirm				
Defendant Expert Defendant Expert West, Sara (Roberts)	11/14				

Thanks and talk soon.

**Alexandra Caritis**

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[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)

**From:** Rachel Abrams <rabraams@peifferwolf.com>  
**Sent:** Wednesday, October 8, 2025 11:33 PM  
**To:** Caritis, Alexandra <alexandra.caritis@kirkland.com>; Marden, Libby <libby.marden@kirkland.com>  
**Cc:** ehurd <ehurd@simmonsfirm.com>; Roopal P. Luhana <luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>  
**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

**This message is from an EXTERNAL SENDER**

Be cautious, particularly with links and attachments.

Alex,

Here's the revised chart. I am available tomorrow morning until 10 am, 1-2 pm and after 3 pm (PT).

Thanks,

Rachel

Expert Name	Deposition Date (Offered)	Pl Proposed Time Limit	Uber Counter	Confirmed?	Supplement?
Plaintiff Expert Weiner, Bruce	10/28	7 hours	7 hours	Need to discuss rebuttal deadline	Yes
Plaintiff Expert Drumwright, Meme (also in JCCP)	Pls to provide new dates	7 hours	7 hours		Yes
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Plaintiff Expert Moore, Julie	October 22	7 hours	7 hours		
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Plaintiff Expert Valliere, Veronique (also in JCCP)	Pl to provide new date	7 hours	7 hours		Yes
Plaintiff Expert Feldis, Jay (also in JCCP)	10/23	7 hours	7 hours	Need to discuss rebuttal deadline	
Plaintiff Expert Kelkar, Rajeev	October 24	7 hours	9 hours	Need to discuss rebuttal deadline	
Plaintiff Expert Rando, Cynthia	October 17	7 hours	12 hours		
Plaintiff Expert Mechanic, Mindy (Psych)	No dates provided	12 hours	21 hours (7.3-hour days or split into 4 days)		
Plaintiff Expert Milnor, Mike	November 3	7 hours	7 hours	Need to discuss rebuttal deadline	
Plaintiff Expert Johnson Robert (also in JCCP)	October 20, 2025 (see Uber's position)  Is this confirmed?	7 hours	3 hours and JCCP dep treated as if taken in MDL	Can do 3 hour non-duplicative dep in afternoon on 10/20 so long as we can treat JCCP dep as if taken in MDL	
Plaintiff Expert Charlene Espritt	November 4-5	7 hours	15 hours (3 for each report)		

(LCP)					
Plaintiff Expert Brown, Erik (toxicologist)	October 15, 2025	7 hours	7 hours	Yes	
Plaintiff Expert Rad, Helena (Psych)	10/17? (previously offered) Is this confirmed?	3 hours	7 hours	We can do 10/17 if that still works	
Defendant Expert Kalady, Matthew (B.L.)	Waiting on Pls to confirm				
Defendant Expert Morris, Jason	November 5, 2025			Yes	
Defendant Expert Okpaku, Joseph	Uber can do 10/20 or find new later dates				
Defendant Expert Piza, Eric	October 30, 2025			Yes	
Defendant Expert Reminick, Alison (Mensing)	Waiting on Pls to confirm				
Defendant Expert Stodden, Victoria	October 21				
Defendant Expert Thomas, Vida	10/27				
Defendant Expert Osgood, Robert (Minfield, Mensing)	Waiting on Pls to confirm				
Defendant Expert Defendant Expert West, Sara (Roberts)	11/14				

Rachel Abrams  
Partner



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---

**From:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>  
**Date:** Wednesday, October 8, 2025 at 5:15 PM  
**To:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>  
**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Roopal P. Luhana <[luhana@chaffinluhana.com](mailto:luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>  
**Subject:** RE: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Rachel,

Let us know a good time to connect tomorrow.

Thanks.

#### Alexandra Caritis

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[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)

**From:** Caritis, Alexandra  
**Sent:** Wednesday, October 8, 2025 2:40 PM  
**To:** 'Rachel Abrams' <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>  
**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Roopal P. Luhana <[luhana@chaffinluhana.com](mailto:luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>  
**Subject:** RE: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Thanks for the update.

I can talk at 130-2PT. If that time doesn't work for you, let's please plan to discuss tomorrow.

#### Alexandra Caritis

---

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**From:** Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>

**Sent:** Wednesday, October 8, 2025 2:31 PM

**To:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>

**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Alex,

I am pulling together a response after meeting with the team. I will send that shortly, but I propose that we set a time to speak again later today. Please let me know your availability. Thanks.

-Rachel

**Rachel Abrams**  
Partner



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**From:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>

**Date:** Tuesday, October 7, 2025 at 7:19 PM

**To:** Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>, Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>, Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>, Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>

**Subject:** RE: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Rachel,

See below an updated chart. Happy to discuss.

Expert Name	Deposition Date (Offered)	Pl Proposed Time Limit	Uber Counter	Confirmed?	Supplement?
Plaintiff Expert Weiner, Bruce	10/28	7 hours	7 hours	Yes (with understanding that if report is supplemented, may need narrow suppl dep)	Yes
Plaintiff Expert Drumwright, Meme (also in JCCP)	Pls to provide new dates	7 hours	7 hours		Yes
Plaintiff Expert Chandler, John	10/24?	7 hours	12 hours	Can Pls do 10/24 (previously offered)?	Yes
Plaintiff Expert Keller, Lacey	Need earlier dates due to rebuttal deadline	7 hours	7 hours		Yes
Plaintiff Expert Moore, Julie	Pl checking if 10/22 works	7 hours	7 hours		
Plaintiff Expert Sawyer, David	Pl to provide new date	7 hours	9 hours		
Plaintiff Expert Tremblay, Tom	No dates provided yet	9 hours	12 hours		
Plaintiff Expert Valliere, Veronique (also in JCCP)	Pl to provide new date	7 hours	7 hours		Yes
Plaintiff Expert Feldis, Jay (also in JCCP)	10/23	7 hours	7 hours	Yes	
Plaintiff Expert Kelkar, Rajeev	No dates provided	7 hours	9 hours		
Plaintiff Expert Rando, Cynthia	Uber confirming whether we can do 10/17 but need another date	7 hours	12 hours		
Plaintiff Expert Mechanic, Mindy (Psych)	No dates provided	12 hours	21 hours (7 3-hour days or split into 4 days)		

Plaintiff Expert Milnor, Mike	10/19? (previously offered)	7 hours	7 hours	We can do 10/19 if that still works	
Plaintiff Expert Johnson Robert (also in JCCP)	October 20, 2025 (see Uber's position)	7 hours	3 hours and JCCP dep treated as if taken in MDL	Can do 3 hour non-duplicative dep in afternoon on 10/20 so long as we can treat JCCP dep as if taken in MDL	
Plaintiff Expert Charlene Espritt (LCP)	No dates provided	7 hours	15 hours (3 for each report)		
Plaintiff Expert Brown, Erik (toxicologist)	October 15, 2025	7 hours	7 hours	Yes	
Plaintiff Expert Rad, Helena (Psych)	10/17? (previously offered)	3 hours	7 hours	We can do 10/17 if that still works	
Defendant Expert Kalady, Matthew (B.L.)	Waiting on Pls to confirm				
Defendant Expert Morris, Jason	November 5, 2025			Yes	
Defendant Expert Okpaku, Joseph	Uber can do 10/20 or find new later dates				
Defendant Expert Piza, Eric	October 30, 2025			Yes	
Defendant Expert Reminick, Alison (Mensing)	Waiting on Pls to confirm				
Defendant Expert Stodden, Victoria	Waiting on Pls to confirm				
Defendant Expert Thomas, Vida	Uber trying to get earlier dates				
Defendant Expert Osgood, Robert (Minfield, Mensing)	Waiting on Pls to confirm				
Defendant Expert Defendant Expert West, Sara (Roberts)	Uber trying to get earlier dates				

Thanks.

#### Alexandra Caritis

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**From:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>  
**Sent:** Monday, October 6, 2025 11:12 PM  
**To:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>  
**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>  
**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Counsel,

Shifting expert deposition dates is not solely based on Judge Cisneros's recent order. There is additional outstanding discovery, and agreements on deposition duration/time/allocation, and document requests, as well as other issues to iron out.

1. **Time Limits:** We will agree to **9 hours from Tremblay**. We will agree to **12 hours for Mechanic** (to be allocated per Uber choice for 4 reports), and **3 hours for Rad**. We will agree to 7 hours for remaining depositions. Plaintiffs are not currently requesting additional time for Uber's expert depositions.
2. **Remote/Zoom:** Plaintiff may be in person for Plaintiff expert depositions.
3. **Supplemental/Rebuttal:** We anticipate supplementing and/or serving rebuttal reports for several of Plaintiffs' experts. We can discuss more tomorrow.
4. **Deposition Dates:** We can confirm the following dates:

Expert Name	Deposition Date	
Plaintiff Expert Weiner, Bruce	October 28, 2025	
Plaintiff Expert Drumwright, Meme (also in JCCP)		
Plaintiff Expert Chandler, John		
Plaintiff Expert Keller, Lacey		
Plaintiff Expert Moore, Julie	October 29, 2025	
Plaintiff Expert Sawyer, David	October 17, 2025	
Plaintiff Expert Tremblay, Tom		
Plaintiff Expert Valliere, Veronique (also in JCCP)		
Plaintiff Expert Feldis, Jay (also in JCCP)		
Plaintiff Expert Kelkar, Rajeev		
Plaintiff Expert Rando, Cynthia		

Plaintiff Expert Mechanic, Mindy (Psych)		
Plaintiff Expert Milnor, Mike		
Plaintiff Expert Johnson Robert (also in JCCP)	October 20, 2025	
Plaintiff Expert Charlene Espritt (LCP)		
Plaintiff Expert Brown, Erik (toxicologist)	October 15, 2025	
Plaintiff Expert Rad, Helena (Psych)		
Defendant Expert Kalady, Matthew (B.L.)		
Defendant Expert Morris, Jason	November 5, 2025	
Defendant Expert Okpaku, Joseph		
Defendant Expert Piza, Eric	October 30, 2025	
Defendant Expert Reminick, Alison (Mensing)		
Defendant Expert Stodden, Victoria		
Defendant Expert Thomas, Vida	Need earlier dates	
Defendant Expert Osgood, Robert (Minfield, Mensing)		
Defendant Expert Defendant Expert West, Sara (Roberts)	Need earlier dates	

We look forward to working through the above tomorrow.

Regards,

Rachel

**Rachel Abrams**  
Partner



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**From:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>

**Date:** Monday, October 6, 2025 at 5:29 PM

**To:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>, Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>, Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>, Sarah London <[sondon@girardsharp.com](mailto:sondon@girardsharp.com)>

**Subject:** RE: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Rachel,

I confirmed at 4CT that we are available to meet tomorrow at 9PT. See attached. That time still works for us.

So that we can be prepared to meaningfully confer, please provide more detail re what you want to discuss. For example, it's hard to imagine how Judge Cisneros' recent order had any impact on Mr. Feldis' deposition scheduled for Wednesday that you're pulling down.

Thanks and we look forward to discussing tomorrow.

**Alexandra Caritis**

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[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)

**From:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>

**Sent:** Monday, October 6, 2025 6:31 PM

**To:** Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>; Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>

**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[sondon@girardsharp.com](mailto:sondon@girardsharp.com)>

**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Alex,

We need to discuss many issues regarding these expert depositions. We are going to provide future dates for Feldis as we work through these issues.

Please confirm your availability for tomorrow. Thank you.

Regards,

Rachel

**Rachel Abrams**  
Partner



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**From:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>

**Date:** Monday, October 6, 2025 at 1:26 PM

**To:** Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>, Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>

**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>, Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>, Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>

**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Thank you. We are creating a chart with all the experts, which will share with you later today. Can we set a call for tomorrow morning, 9:00 am PT?

**Rachel Abrams**  
Partner



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**From:** Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Date:** Monday, October 6, 2025 at 10:07 AM

**To:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>, Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>

**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>, Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>, Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>

**Subject:** RE: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Hi Rachel,

The Sara West report was served to you on 8/8.

We also want to confirm that that the only two experts for which you expect supplementation are Chandler and Keller. If so, we want to know how long you need to make the supplementation. Once we know this, we can send over confirmed dates for plaintiffs' experts.

Thanks,  
Libby

**Libby Marden**

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333 Wolf Point Plaza, Chicago, IL 60654  
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[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)

**From:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>

**Sent:** Monday, October 6, 2025 11:44 AM

**To:** Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>; Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>

**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>  
**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Alex,

I'll respond in more detail shortly, but we never received an expert report for Sara West. Please advise. Thanks.

Regards,

Rachel

**Rachel Abrams**  
Partner



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**From:** Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Date:** Friday, October 3, 2025 at 2:30 PM

**To:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>, Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>

**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>, Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>, Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>

**Subject:** RE: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Hi Rachel,

Here are our experts' availability. Dr. Reminick is out sick, but we are working to track down dates for her.

Thanks,  
Libby

Kalady, Matthew	10/24 starting at 1 PM ET
Morris, Jason	10/23 or 11/5
Okpaku, Joseph	10/15 or 10/20
Osgood, Robert	10/20 or 10/21
Piza, Eric	10/27 or 10/30
Stodden, Victoria	10/20 or 10/21
Thomas, Vida	11/13, 11/11 (starting 1 ET), 11/12 (starting 1 PM ET)
West, Sara	11/14 at 1 pm ET

**Libby Marden**

---

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333 Wolf Point Plaza, Chicago, IL 60654  
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F +1 312 862 2200

---

[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)

**From:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>

**Sent:** Friday, October 3, 2025 3:59 PM

**To:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>

**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Subject:** RE: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Can we try 215? I have to grab my kids so I don't have tons of flexibility. I can also do tomorrow AM or later tonight.

Thanks.

**Alexandra Caritis**

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F +1 713 836 3601

[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)

**From:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>  
**Sent:** Friday, October 3, 2025 3:49 PM  
**To:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>  
**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>  
**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Alex- Can we bump this meeting a half hour?

Rachel Abrams

Partner



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 San Francisco, CA 94111  
 Main: 415-766-3544 | Direct: 415-426-5641

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**From:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>  
**Date:** Friday, October 3, 2025 at 10:05 AM  
**To:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>  
**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>, Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>, Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>, Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>  
**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Sure. I'll send a zoom.

Rachel Abrams

Partner



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**From:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>  
**Date:** Friday, October 3, 2025 at 9:58 AM  
**To:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>  
**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>, Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>, Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>, Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>  
**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Yes, can we please plan on 2PT?

Thanks.

Alexandra Caritis

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[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)

On Oct 3, 2025, at 11:55 AM, Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)> wrote:

Yes, agreed. We'll provide the experts who we believe can proceed on the offered dates, and which we believe need to be pushed. Are you available to discuss later today? I am available at 12:30 PT or after 2 pm PT.

Thanks,

Rachel

**Rachel Abrams**   
Partner

<Outlook-image-5-2hgph7.png>

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San Francisco, CA 94111

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**From:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>

**Date:** Friday, October 3, 2025 at 9:49 AM

**To:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>

**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>, Roopal P. Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>, Sarah London <[sondon@girardsharp.com](mailto:sondon@girardsharp.com)>, Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Thanks, Rachel. You all requested dates by today so we will send witness availability this afternoon.

Before we accept your proposed dates, we would like confirmation re the experts that you contend may require supplementation pending Judge Cisneros' ruling. For example, we can do Feldis 10/8 so long as you won't be supplementing his report.

**Alexandra Caritis**

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---

[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)

On Oct 3, 2025, at 11:39 AM, Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)> wrote:

Alex,

I'm following up on the below email. Plaintiffs proposed several expert deposition dates next week, which have not been confirmed, and at least some of these need to be pushed now. We still have not received any Uber expert deposition dates. Please let me know when you're available to discuss today. Thanks.

Regards,

Rachel

**Rachel Abrams**   
Partner

<Outlook-image-5-4hgvi5.png>

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San Francisco, CA 94111

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**From:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>  
**Date:** Wednesday, October 1, 2025 at 2:32 PM  
**To:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>  
**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>  
**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Alex,

Thanks for connecting today. We can discuss more fully when you provide Uber's experts availability and more clarity on the length of time requested for specific plaintiff's experts (which will do so for Uber's experts as well), but I wanted clarification on few points.

First, you requested later dates for Rando's deposition and mentioned that next week was too soon, but we offered 10/16 or 10/17. Second, you mentioned the possibility of a stipulation for testimony on experts already deposed in the JCCP proceedings. I need more clarity on what Uber envisions with regards to these stips. Finally, as discovery is still ongoing and some experts may be supplementing their reports accordingly, the dates proposed may need adjusting.

I am available tomorrow and Friday. We will provide a chart once we have Uber's proposed dates that we can both work from for coordinating.

Thanks,

Rachel

**Rachel Abrams**   
 Partner  
  
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**From:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>  
**Date:** Wednesday, October 1, 2025 at 12:33 PM  
**To:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>  
**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>  
**Subject:** RE: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Great, thanks. Talk soon.

**Alexandra Caritis**

---

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 F +1 713 836 3601

---

[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)

**From:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>  
**Sent:** Wednesday, October 1, 2025 2:31 PM  
**To:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>  
**Cc:** ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>  
**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

I'm adding Ellyn as well, and I'll send a zoom. Not sure if she can join.

**Rachel Abrams**

Partner

<image002.png>

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**From:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>

**Date:** Wednesday, October 1, 2025 at 12:25 PM

**To:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>

**Subject:** RE: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Thanks, I will give you a call in 20 mins at 12:45PT. I'll call the direct line in your sig block unless there is a better number to reach you.

**Alexandra Caritis**

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[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)

**From:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>

**Sent:** Wednesday, October 1, 2025 2:21 PM

**To:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Tarpley, Lisa A. <[ltarpley@kirkland.com](mailto:ltarpley@kirkland.com)>; [slondon@girardsharp.com](mailto:slondon@girardsharp.com); [cwoods@lchb.com](mailto:cwoods@lchb.com); [awanless@lchb.com](mailto:awanless@lchb.com); [akaufman@girardsharp.com](mailto:akaufman@girardsharp.com); [jwilliams@whlaw.com](mailto:jwilliams@whlaw.com); [babramson@whlaw.com](mailto:babramson@whlaw.com); [mlecocke@whlaw.com](mailto:mlecocke@whlaw.com); [wcubberly@whlaw.com](mailto:wcubberly@whlaw.com); [bbaskin@whlaw.com](mailto:bbaskin@whlaw.com); [mshaw@whlaw.com](mailto:mshaw@whlaw.com); [Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)

**Cc:** Brown, Alli <[alli.brown@kirkland.com](mailto:alli.brown@kirkland.com)>; Davidson, Jessica <[jessica.davidson@kirkland.com](mailto:jessica.davidson@kirkland.com)>; Vartain, Laura <[laura.vartain@kirkland.com](mailto:laura.vartain@kirkland.com)>; Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>; Cox, Christopher <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; [mshortnacy@shb.com](mailto:mshortnacy@shb.com); [OOT@shb.com](mailto:OOT@shb.com); [jhaider@shb.com](mailto:jhaider@shb.com); [vgromada@shb.com](mailto:vgromada@shb.com); [JWIKLER@shb.com](mailto:JWIKLER@shb.com); [bhooper@shb.com](mailto:bhooper@shb.com); [kpj@shb.com](mailto:kpj@shb.com); [caubuchon@shb.com](mailto:caubuchon@shb.com); [BVANEK@shb.com](mailto:BVANEK@shb.com); [rlewis@shb.com](mailto:rlewis@shb.com); [SSCHUTTER@shb.com](mailto:SSCHUTTER@shb.com); #Uber KE – Paralegal Team <[Uber KE Paralegal Team@kirkland.com](mailto:Uber KE Paralegal Team@kirkland.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Uber MDL Expert Team <[ubermdlexpert@chaffinluhana.com](mailto:ubermdlexpert@chaffinluhana.com)>; ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>

**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

I am available at 12:45 pm PT or after 2 pm PT today. Please let me know what works. Thanks.

**Rachel Abrams**

<image001.png>

Partner

<image002.png>

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[peifferwolf.com](http://peifferwolf.com) <image003.png> <image004.png> <image005.png>

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**From:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>

**Date:** Wednesday, October 1, 2025 at 11:44 AM

**To:** Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>, Tarpley, Lisa A. <[ltarpley@kirkland.com](mailto:ltarpley@kirkland.com)>, [slondon@girardsharp.com](mailto:slondon@girardsharp.com) <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>, [cwoods@lchb.com](mailto:cwoods@lchb.com) <[cwoods@lchb.com](mailto:cwoods@lchb.com)>, [awanless@lchb.com](mailto:awanless@lchb.com) <[awanless@lchb.com](mailto:awanless@lchb.com)>, [akaufman@girardsharp.com](mailto:akaufman@girardsharp.com) <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>, [jwilliams@whlaw.com](mailto:jwilliams@whlaw.com) <[jwilliams@whlaw.com](mailto:jwilliams@whlaw.com)>, [babramson@whlaw.com](mailto:babramson@whlaw.com) <[babramson@whlaw.com](mailto:babramson@whlaw.com)>, [mlecocke@whlaw.com](mailto:mlecocke@whlaw.com) <[mlecocke@whlaw.com](mailto:mlecocke@whlaw.com)>, [wcubberly@whlaw.com](mailto:wcubberly@whlaw.com) <[wcubberly@whlaw.com](mailto:wcubberly@whlaw.com)>, [bbaskin@whlaw.com](mailto:bbaskin@whlaw.com) <[bbaskin@whlaw.com](mailto:bbaskin@whlaw.com)>, [mshaw@whlaw.com](mailto:mshaw@whlaw.com) <[mshaw@whlaw.com](mailto:mshaw@whlaw.com)>, [Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com) <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>

**Cc:** Brown, Alli <[alli.brown@kirkland.com](mailto:alli.brown@kirkland.com)>, Davidson, Jessica <[jessica.davidson@kirkland.com](mailto:jessica.davidson@kirkland.com)>, Vartain, Laura

<[laura.vartain@kirkland.com](mailto:laura.vartain@kirkland.com)>, Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>, Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>, Cox, Christopher <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>, [mshortnacy@shb.com](mailto:mshortnacy@shb.com) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>, [OOT@shb.com](mailto:OOT@shb.com) <[OOT@shb.com](mailto:OOT@shb.com)>, [jhaider@shb.com](mailto:jhaider@shb.com) <[jhaider@shb.com](mailto:jhaider@shb.com)>, [vgromada@shb.com](mailto:vgromada@shb.com) <[vgromada@shb.com](mailto:vgromada@shb.com)>, [JWIKLER@shb.com](mailto:JWIKLER@shb.com) <[JWIKLER@shb.com](mailto:JWIKLER@shb.com)>, [bhooper@shb.com](mailto:bhooper@shb.com) <[bhooper@shb.com](mailto:bhooper@shb.com)>, [kpj@shb.com](mailto:kpj@shb.com) <[kpj@shb.com](mailto:kpj@shb.com)>, [caubuchon@shb.com](mailto:caubuchon@shb.com) <[caubuchon@shb.com](mailto:caubuchon@shb.com)>, [BVANEK@shb.com](mailto:BVANEK@shb.com) <[BVANEK@shb.com](mailto:BVANEK@shb.com)>, [rlewis@shb.com](mailto:rlewis@shb.com) <[rlewis@shb.com](mailto:rlewis@shb.com)>, [SSCHUTTER@shb.com](mailto:SSCHUTTER@shb.com) <[SSCHUTTER@shb.com](mailto:SSCHUTTER@shb.com)>, #Uber KE – Paralegal Team <[Uber KE Paralegal Team@kirkland.com](mailto:Uber KE Paralegal Team@kirkland.com)>, Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>, Uber MDL Expert Team <[ubermdlexpert@chaffinluhana.com](mailto:ubermdlexpert@chaffinluhana.com)>, ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>

**Subject:** RE: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady  
Rachel,

We will revert with dates shortly. We would also like to briefly discuss a few points w/r/t scheduling. Do you have availability today or tomorrow? I don't think we'll need more than 10-15 minutes. Happy to send you a separate note to spare inboxes.

Thanks.

**Alexandra Caritis**

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F +1 713 836 3601

[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)

---

**From:** Rachel Abrams <[rabraams@peifferwolf.com](mailto:rabraams@peifferwolf.com)>  
**Sent:** Wednesday, October 1, 2025 1:17 PM  
**To:** Tarpley, Lisa A. <[ltarpley@kirkland.com](mailto:ltarpley@kirkland.com)>; [slondon@girardsharp.com](mailto:slondon@girardsharp.com); [cwoods@lchb.com](mailto:cwoods@lchb.com); [awanless@lchb.com](mailto:awanless@lchb.com); [akaufman@girardsharp.com](mailto:akaufman@girardsharp.com); [jwilliams@whlaw.com](mailto:jwilliams@whlaw.com); [babramson@whlaw.com](mailto:babramson@whlaw.com); [mlecocke@whlaw.com](mailto:mlecocke@whlaw.com); [wcubberly@whlaw.com](mailto:wcubberly@whlaw.com); [bbaskin@whlaw.com](mailto:bbaskin@whlaw.com); [mshaw@whlaw.com](mailto:mshaw@whlaw.com); [Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)  
**Cc:** Brown, Alli <[alli.brown@kirkland.com](mailto:alli.brown@kirkland.com)>; Davidson, Jessica <[jessica.davidson@kirkland.com](mailto:jessica.davidson@kirkland.com)>; Vartain, Laura <[laura.vartain@kirkland.com](mailto:laura.vartain@kirkland.com)>; Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>; Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Cox, Christopher <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; [mshortnacy@shb.com](mailto:mshortnacy@shb.com); [OOT@shb.com](mailto:OOT@shb.com); [jhaider@shb.com](mailto:jhaider@shb.com); [vgromada@shb.com](mailto:vgromada@shb.com); [JWIKLER@shb.com](mailto:JWIKLER@shb.com); [bhooper@shb.com](mailto:bhooper@shb.com); [kpj@shb.com](mailto:kpj@shb.com); [caubuchon@shb.com](mailto:caubuchon@shb.com); [BVANEK@shb.com](mailto:BVANEK@shb.com); [rlewis@shb.com](mailto:rlewis@shb.com); [SSCHUTTER@shb.com](mailto:SSCHUTTER@shb.com); #Uber KE – Paralegal Team <[Uber KE Paralegal Team@kirkland.com](mailto:Uber KE Paralegal Team@kirkland.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Uber MDL Expert Team <[ubermdlexpert@chaffinluhana.com](mailto:ubermdlexpert@chaffinluhana.com)>; ehurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>  
**Subject:** Re: Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

Counsel,

Please provide dates and location for Uber's expert depositions as soon as possible. Given the short window we need to schedule these ASAP. Thank you.

Regards,

Rachel

**Rachel Abrams**   
Partner



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---

**From:** Tarpley, Lisa A. <[ltarpley@kirkland.com](mailto:ltarpley@kirkland.com)>  
**Date:** Friday, September 26, 2025 at 8:40 PM  
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**Subject:** Uber\_MDL: Defendants' Expert Reports for Eric Piza, Jason Morris & Matthew Kalady

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Counsel,

Please see the attached Expert Reports for Eric Piza, Jason Morris & Matthew Kalady served in *In re Uber Technologies, Inc.*, Case No. 23-md-03084-CRB.

Kind regards,

Lisa

**Lisa A. Tarpley**  
Senior Paralegal

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 Attachments expire on Oct 04, 2025

 3 PDFs

2025.09.26 Expert Report of Dr. Eric Piza (MDL 23-03084).pdf, 2025.09.26 Expert Report of Jason Morris (MDL 23-03084).pdf,  
2025.09.26 Expert Report of Matthew Kalady (MDL 23-03084\_B.L.).pdf

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